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Attorneys for Defendants

RICHARDSON'S BAY REGIONAL AGENCY

and CURTIS HAVEL

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ROBYN LYNN KELLY,

Plaintiff,

v.

RICHARDSON'S BAY REGIONAL
AGENCY; CURTIS HAVEL,

Defendants.

Case No. 20-cv-06791-CRB

**JOINT STIPULATION TO BE TAKEN
OFF PRE-SETTLEMENT CALENDAR;
~~[PROPOSED]~~ ORDER**

TO THE COURT, ALL PARTIES AND THEIR COUNSEL:

PLEASE TAKE NOTICE THAT this request is made jointly by Defendants

RICHARDSON'S BAY REGIONAL AGENCY and CURTIS HAVEL and Plaintiff ROBYN

LYNN KELLY by and through their attorneys of record, with reference to the following:

WHEREAS, Plaintiff filed her Complaint on September 30, 2020;

WHEREAS, Defendants filed their Answer on October 27, 2020;

WHEREAS, written discovery has commenced, but has not been completed;

WHEREAS, Plaintiff's deposition has not been completed;

WHEREAS, key witness depositions have not been completed;

WHEREAS, the parties have not gathered sufficient information in order to begin
settlement discussions;

1 **NOW THEREFORE**, Defendants and Plaintiff request that:

- 2 1. The matter be taken off of pre-settlement calendar and an initial Case Management
3 Conference be set within ninety (90) days.

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5 DATED: May 26, 2021

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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8 By: /s/
9 David V. Roth
10 Attorneys for Defendants,
11 RICHARDSON'S BAY REGIONAL AGENCY
and CURTIS HAVEL

12 DATED: May 26, 2021

BERSCHLER ASSOCIATES, PC

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14 By: /s/
15 Arnold Berschler
16 Attorneys for Plaintiff,
17 ROBYN LYNN KELLY
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~~PROPOSED~~ ORDER

Having considered the JOINT STIPULATION TO BE TAKEN OFF PRE-SETTLEMENT CALENDAR and finding good cause, IT IS HEREBY ORDERED THAT:

1. The joint request is GRANTED;

2. The Case Management Conference is set for August 13, 2021 at 8:30 a.m.
A Joint Case Management Statement due by August 6, 2021.

IT IS SO ORDERED.

Date: May 27, 2021



Judge of the United States District Court